

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

THE STATE OF ARIZONA, et al.,

PLAINTIFFS,

v.

MERRICK GARLAND in his official capacity
as Attorney General of the United States of
America; et al.,

DEFENDANTS.

CIVIL ACTION NO. 6:22-cv-01130

**DECLARATION OF ATTORNEY JOSEPH SCOTT ST. JOHN ISO
REQUEST FOR JUDICIAL NOTICE**

I, Joseph Scott St. John, declare as follows: I am a Deputy Solicitor General at the Louisiana Department of Justice. I am counsel for the State of Louisiana in the above-captioned litigation. I am over the age of 18, and I have personal knowledge of the facts contained in this Declaration.

1. Attached as Exhibit 200 is a true and accurate copy of a document downloaded from oversight.house.gov.¹

2. Attached as Exhibit 201 is a true and accurate printout from homeland.house.gov.²

3. Attached as Exhibit 202 is a true and accurate printout of a document obtained from homeland.house.gov.³

¹ <https://oversight.house.gov/wp-content/uploads/2024/01/Joint-CPA-Transcribed-Interviews-Report-01-16-2024-FINAL-pdf.pdf>

² <https://homeland.house.gov/2023/03/16/homeland-security-committee-republicans-confirm-the-cause-of-this-unprecedented-border-crisis-secretary-alejandro-mayorkas/>

³ <https://homeland.house.gov/2023/12/08/new-southwest-border-sector-chiefs-confirm-that-lack-of-consequences-encourages-more-illegal-immigration/>

4. Attached as Exhibit 203 is a true and accurate printout of a document obtained from dhs.gov.⁴

5. Attached as Exhibit 204 is a true and accurate printout of a webpage on uscis.gov.⁵

6. Attached as Exhibit 205 (MANUAL) is a true and accurate copy of a spreadsheet identified as an “asylum processing rule cohort report” downloaded from dhs.gov on January 22, 2024.⁶

7. Attached as Exhibit 207 is a true and accurate excerpt of a document downloaded from dhs.gov.⁷

8. Attached as Exhibit 208 is a true and accurate printout of a webpage on www.cbp.gov.⁸

9. Attached as Exhibit 209 is a true and accurate printout of a webpage on www.cbp.gov.⁹

10. Attached as Exhibit 210 is a true and accurate copy of a document downloaded from www.ice.gov.¹⁰

11. Attached as Exhibit 211 is a true and accurate copy of a document downloaded from www.congress.gov.¹¹

12. Attached as Exhibit 212 is a true and accurate copy of a document downloaded from www.uscis.gov.¹²

⁴ https://www.dhs.gov/sites/default/files/2023-08/23_0717_uscis_asylum_application_processing.pdf

⁵ <https://www.uscis.gov/humanitarian/refugees-and-asylum/asylum/fact-sheet-implementation-of-the-credible-fear-and-asylum-processing-interim-final-rule>

⁶ <https://www.dhs.gov/immigration-statistics/special-reports/asylum-processing-rule-report>

⁷ https://www.dhs.gov/sites/default/files/2023-07/23_0630_cisomb_2023-annual-report-to-congress.pdf

⁸ <https://www.cbp.gov/newsroom/stats/southwest-land-border-encounters>

⁹ <https://www.cbp.gov/newsroom/stats/sw-border-migration-fy2020>

¹⁰ <https://www.ice.gov/doclib/eoy/iceAnnualReportFY2023.pdf>

¹¹ <https://www.congress.gov/104/crpt/hrpt469/CRPT-104hrpt469-pt1.pdf>

¹² <https://www.uscis.gov/sites/default/files/document/forms/i-589.pdf>

13. Attached as Exhibit 213 is a true and accurate copy of a document downloaded from www.justice.gov.¹³

14. Attached as Exhibit 214 is a true and accurate copy of a document downloaded from dhs.gov.¹⁴

15. Attached as Exhibit 215 is a true and accurate copy of a document downloaded from uscis.gov.¹⁵

16. Attached as Exhibit 216 is a true and accurate copy of a document downloaded from govinfo.gov.¹⁶

17. Attached as composite Exhibit 217 is a true and accurate copy of a document and its attached documents downloaded from regulations.gov.¹⁷

18. Attached as Exhibit 218 (MANUAL) is a true and accurate copy of a video downloaded from a link on homeland.house.gov.¹⁸

19. Reference to Exhibit 219 intentionally omitted. See St. John Public Declaration.¹⁹

20. Attached as Exhibit 220 is a true and accurate copy of a GAO Report, as obtained from gao.gov.²⁰

21. Attached as Exhibit 221 is a true and accurate printout of a spreadsheet downloaded from www.census.gov.²¹

¹³ <https://www.justice.gov/eoir/file/1216991/download>

¹⁴ <https://www.dhs.gov/news/2022/05/26/fact-sheet-implementation-credible-fear-and-asylum-processing-interim-final-rule>

¹⁵ <https://www.uscis.gov/humanitarian/refugees-and-asylum/asylum/fact-sheet-implementation-of-the-credible-fear-and-asylum-processing-interim-final-rule>

¹⁶ <https://www.govinfo.gov/app/details/CPRT-104WPRT27305>

¹⁷ <https://www.regulations.gov/comment/USCIS-2021-0012-4980>

¹⁸ <https://homeland.house.gov/2023/03/14/tomorrow-homeland-security-committee-field-hearing-to-examine-secretary-mayorkas-border-crisis-by-design/>

¹⁹ Intentionally omitted.

²⁰ <https://www.gao.gov/assets/gao-20-250.pdf>

²¹ <https://www.census.gov/data/tables/2023/demo/income-poverty/p60-280.html>

22. Attached as Exhibit 222 is a true and accurate copy of a document downloaded from cbo.gov.²²

23. Attached as Exhibit 223 is a true and accurate printout of a Congressional Research Service Report as obtained from crsreports.congress.gov.²³

24. Attached as Exhibit 224 is a true and accurate printout of a webpage on www.fns.usda.gov.²⁴

25. Attached as Exhibit 225 is a true and accurate printout of a webpage on www.healthcare.gov.²⁵

26. Attached as Exhibit 226 is a true and accurate printout of a webpage on www.uscis.gov.²⁶

27. Attached as Exhibit 227 is a true and accurate copy of a letter downloaded from www.justice.gov.²⁷

28. Attached as Exhibit 228 is a true and accurate excerpt of a document downloaded from www.dhs.gov.²⁸

29. Attached as Exhibit 229 is a true and accurate copy of a document downloaded from acf.hhs.gov.²⁹

30. Attached as Exhibit 230 is a true and accurate printout of a webpage on www.fns.usda.gov.³⁰

²² <https://www.cbo.gov/sites/default/files/110th-congress-2007-2008/reports/12-6-immigration.pdf>

²³ <https://crsreports.congress.gov/product/pdf/IF/IF11912>

²⁴ <https://www.fns.usda.gov/snap/eligibility/citizen/non-citizen-policy>

²⁵ <https://www.healthcare.gov/immigrants/lawfully-present-immigrants/>

²⁶ <https://www.uscis.gov/humanitarian/refugees-and-asylum/asylum/obtaining-asylum-in-the-united-states>

²⁷ <https://www.justice.gov/sites/default/files/crt/legacy/2014/05/08/plylerletter.pdf>

²⁸ https://www.dhs.gov/sites/default/files/2022-03/U.S.%20Immigration%20and%20Customs%20Enforcement_Remediated.pdf

²⁹ https://www.acf.hhs.gov/sites/default/files/documents/orr/orr_asylee_fact_sheet.pdf

³⁰ <https://www.fns.usda.gov/snap/eligibility/citizen/non-citizen-policy>

31. Attached as Exhibit 231 is a true and accurate printout of a Congressional Research Service Report as obtained from crsreports.congress.gov.³¹

32. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF LOUISIANA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana, this 29th day of January 2024.

/s/ Joseph Scott St. John

³¹

<https://crsreports.congress.gov/product/pdf/R/R43357#:~:text=Medicaid%20is%20an%20entitlement%20for,to%20federal%20Medicaid%20matching%20funds>.